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Attorneys for Defendant Tony Daniel Klein

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

TONY DANIEL KLEIN,

DEFENDANT.

No. 3:22-cr-00084-SI-1

**DEFENDANT'S PROPOSED WITNESS
LIST**

Defendant hereby submits the following list of witnesses it may call to testify in the above-captioned matter, beginning July 10, 2023. The Defendant respectfully requests the opportunity to amend this list, both to add or subtract witnesses, as may be necessary throughout trial.

1. Andrea Sang
2. Jill Bird
3. Tiffany Harrison
4. Celia Nash
5. Teresa Gillette
6. Nicole Navarre
7. Constantine Alleyne

Defendant also intended to call the following people as witnesses, who are also listed as Government Witnesses.

8. Caryn Ackerman, FBI
9. Wendy Armitage, CCCF Staff
10. Erik Becker, CCCF Staff
11. Elizabeth Bowditch, FBI
12. Dave Bowman, Investigator with Board of Nursing
13. Mike Brasch, CCCF Nursing Staff
14. Alana Bruns, CCCF nursing staff
15. Ed Childress, CCCF Corrections Staff
16. Karin De La O, CCCF Corrections Staff
17. Chad Drew, OSP
18. Erin Greiner Flindt, FBI
19. Teresa Hannon, CCCF Nursing Staff
20. Scott Haynes, CCCF Behavioral Health Staff

21. Eric Hiser, FBI
22. Dane Koznek, CCCF Nursing Staff
23. Roslyn Lamb, CCCF Corrections Staff
24. Katherine Martin, CCCF Nursing Staff
25. Sydney McKay, CCCF Behavioral Health Staff
26. Marie Merten, CCCF Corrections Staff
27. Lindsay Noack, CCCF Corrections Staff
28. Christina Pries, CCCF nursing staff
29. Lewis Riggs, CCCF Corrections Staff
30. Liz Sabin, CCCF Nursing Staff
31. Erick Sage, PREA coordinator ODOC
32. Lori Schain, CCCF Nursing Staff
33. Linda Springer, CCCCFF Nursing Staff
34. Raymond Van Pelt, CCCF Corrections Staff
35. Christina Dietz, Former AIC at CCCF

Respectfully submitted on June 30, 2023

/s/Matthew G. McHenry
Matthew G. McHenry
Counsel for Tony Klein

/s/Amanda Alvarez Thibeault
Amanda Alvarez Thibeault
Counsel for Tony Klein